

AFFIDAVIT OF DEBORAH STEWART

STATE OF MISSISSIPPI

COUNTY OF Forrest

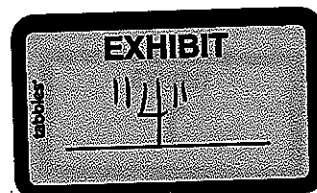
Personally came and appeared before me, the undersigned authority in and for the said County and State, within my jurisdiction, the within named Deborah Stewart, who, having been duly sworn by me, states on oath:

1. My name is Deborah Stewart and I am over 21 years of age. I am of sound mind and I am competent to testify as to the matters set forth in this affidavit.

2. As Area Social Work Supervisor ("ASWS") at the Forrest County Office of the Mississippi Department of Human Services ("MDHS"), I am familiar with the minors John A. and Olivia Y who are Plaintiffs in the case styled *Olivia Y. et al. v. Haley Barbour, et al.* (United States District Court for the Southern District of Mississippi, Jackson Division; C/A No. 3:04cv251LN).

3. John came into the custody of MDHS on March 5, 1999 when he was 9 years old. His mother was addicted to crack and would leave John and his siblings alone or with a friend for days at a time. Prevention Services and a Family Preservation Specialist assisted his family. MDHS took custody of John and his siblings after John's school reported that he was exhibiting violent behavior attempting to harm himself and others.

4. John received an evaluation and was eventually diagnosed with Axis I: Bipolar Disorder (mood instability), and severe psychosis. He often had very explosive outbursts and was extremely aggressive. John was placed on psychotropic drugs by his doctor to assist with his disorder. Due to his medical condition, it was difficult for him to get along with others in his placements.



5. On or about January 21, 2004, John was placed in the foster home of Mr. and Mrs. B in Forrest County. John is currently enrolled in high school and since his placement with the Mr. and Mrs. B, his grades have improved. Although John still struggles with some behavioral problems, there has been overall improvement in his behavior and mental health. John has maintained this placement for over two years, which is the longest he has successfully maintained a placement.

6. Olivia Y was born three (3) months premature. Her newborn drug screen was positive for cocaine. Approximately September 2003, Olivia Y. was brought into the custody of MDHS after her mother's drug screen results were positive for cocaine, marijuana, and alcohol.

7. Since coming into MDHS custody, Olivia has been placed in speech therapy and has had regular medical and dental appointments. On December 29, 2003, Olivia was placed in the home of Mr. & Mrs. W, a relative placement, where she remains today. Olivia is doing very well in the placement.

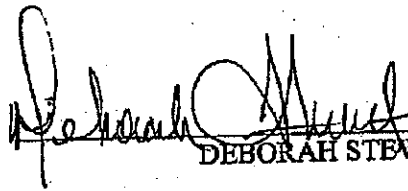
8. MDHS has worked hard to assist both John and Olivia. MDHS has never been indifferent to the needs of John or Olivia. John and Olivia both been provided with sufficient food, clothing, shelter, and medical care, and MDHS has done what it reasonably can to protect John and Olivia from harm.

9. The matters set forth herein are based on my own experiences, observations, and personal knowledge of such matters.

8. I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge, information, and belief.

FURTHER AFFIANT SAYETH NOT, this the 20th day of

April, 2006.


DEBORAH STEWART

SWORN TO AND SUBSCRIBED BEFORE ME, this the 28 day of

April, 2006.


NOTARY PUBLIC

My Commission Expires:

MY COMMISSION EXPIRES OCTOBER 28, 2006